

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Tangie Smith)	Chapter 13
)	Case No. 15 B 27263
Debtor(s))	Judge A. Benjamin Goldgar

Notice of Motion/Certificate of Service

Tangie Smith
10834 S Eberhart Ave Apt 1S
Chicago, IL 60628

Debtor Attorney: Deshur Law Firm LLC
via Clerk's ECF noticing procedures

On February 26, 2019 at 10:00AM, I will appear at the location listed to the right, and present this motion, a copy which is hereby served upon you.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 642
- > Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Saturday, February 16, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case for Material Default

Comes now Marilyn O. Marshall, Standing Trustee, pursuant to 11 U.S.C. § 1307(c)(6), and respectfully states the following:

1. This is a core proceeding under 28 U.S.C. § 157.
2. Debtor filed for Chapter 13 relief on August 10, 2015.
3. This case was confirmed on October 13, 2015, for a total of 36 months with plan payments of \$365.00.
4. As of the filing of this motion, 42 months have expired since this case was filed.
5. The plan is in material default as it cannot complete at the proposed terms.
6. The balance on this case is approximately \$11,456.94 and at the current rate, the plan will not complete for another 31 months.

WHEREFORE, the Trustee prays that the Court enter an order dismissing this case, and grant any such other relief as it may deem proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE
